

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

In Re:

Case No.: _____

Judge: _____

Chapter: 13

CHAPTER 13 DEBTOR'S CERTIFICATION IN OPPOSITION

The debtor in this case opposes the following (**choose one**):

1. ☐ Motion for Relief from the Automatic Stay filed by _____ ,
creditor,

A hearing has been scheduled for _____, at _____.

- ☐ Motion to Dismiss filed by the Chapter 13 Trustee.

A hearing has been scheduled for _____, at _____.

- ☐ Certification of Default filed by _____,

I am requesting a hearing be scheduled on this matter.

2. I oppose the above matter for the following reasons (**choose one**):

- ☐ Payments have been made in the amount of \$ _____, but have not
been accounted for. Documentation in support is attached.

☐ Payments have not been made for the following reasons and debtor proposes repayment as follows (**explain your answer**):

☐ Other (**explain your answer**):

3. This certification is being made in an effort to resolve the issues raised in the certification of default or motion.
4. I certify under penalty of perjury that the above is true.

Date: _____

Debtor's Signature

Date: _____

Debtor's Signature

NOTES:

1. Under D.N.J. LBR 4001-1(b)(1), this form must be filed with the court and served on the Chapter 13 Trustee and creditor, if applicable not later than 7 days before the date of the hearing if filed in opposition to a Motion for Relief from the Automatic Stay or Chapter 13 Trustee's Motion to Dismiss.
2. Under D.N.J. 4001-1 (b)(2), this form must be filed with the court and served on the Chapter 13 Trustee and creditor, if applicable not later than 14 days after the filing of a Certification of Default.

**Attachment to Certification in Opposition
to Trustee's Certification of Default**

Attached is the Report from the National Data Center website. As the Report indicates, I made good faith payments of \$1,780 per month to the Trustee in 2018 in January, March, May, and July. I have had some recent extraordinary expenses and have struggled to maintain my mortgage payments under the mortgage modification agreement. I may be able to make a payment to the Trustee prior to the return date of the Hearing on this objection to the Trustee's Certification of default.

Unfortunately, I have recently lost my sight. I had extremely high blood pressure and lost my sight due to an embolism. I am treating with various doctors in the hopes of having my sight restored. My ex-wife may be able to help with Trustee and mortgage payments. I am also attempting to sell my car and liquidate other assets to maintain Trustee payments.



Case Number 1613100

Debtor Information

Debtor 1 Bruce Wayne Morris
Debtor 2

Trustee Information

Trustee Albert Russo

Status

Data Last Updated Sep 24, 2018
Total Paid into Plan \$43,478.60
Petition Filed on Feb 22, 2016

Debtor's Latest Payments

CASHIER'S CHECK \$1,780.00 07/25/2018
CASHIER'S CHECK \$1,780.00 05/10/2018
EPAY NSF \$-1,780.00 04/23/2018

CASE INFORMATION

Case Number	1613100	Date Petition Filed	02/22/2016
Case Status	Confirmed	Plan Filed Date	06/30/2017
NDC Case Status	Active-Open	First 341 Meeting Date	04/07/2016
Balance on Hand	\$18.65	Date Case Confirmed	09/13/2016
Last Receipt Date	07/25/2018	Date Case Closed	
Last Receipt Amount	\$1,780.00		
Last Disbursement Date	09/05/2018		
Plan Base	\$104,264.60		
Total Paid into Plan	\$43,478.60		
Total Paid to all Parties	\$43,459.95		

Additional Parties In Interest

TRUSTEE INFORMATION

Trustee Name Albert Russo
Amount Paid to Date \$2,606.48

JUDGE/ATTORNEY INFORMATION

Judge Name Michael B. Kaplan
Attorney Name Allen I. Gorski, Esq.
Attorney Fee in Plan
Attorney Paid to Date
Attorney Fee Paid Outside Plan

DEBTOR INFORMATION

Debtor 1	Debtor 2
Debtor Name Bruce Wayne Morris	Debtor Name
Direct Payment Amt \$1,780.00	Direct Payment Amt
Direct Payment Frequency MONTHLY	Direct Payment Frequency
Payroll Deduction Amt	Payroll Deduction Amt
Payroll Deduction Frequency	Payroll Deduction Frequency

PLAN STEPS

COURT DOCKET

START DATE	DEBTOR NAME	PAYMENT AMOUNT	PAYMENT FREQUENCY	NUMBER OF PAY PERIODS	PAYING TYPE	PAYEE TYPE
03/01/2016	BRUCE WAYNE MORRIS	\$1,574.20	MONTHLY	8		DEBTOR1
11/01/2016	BRUCE WAYNE MORRIS	\$1,675.00	MONTHLY	9		DEBTOR1
08/01/2017	BRUCE WAYNE MORRIS	\$1,675.00	MONTHLY	2		DEBTOR1
10/01/2017	BRUCE WAYNE MORRIS	\$1,780.00	MONTHLY			DEBTOR1

Claim Summary



Case 1613100 Debtor1 BRUCE WAYNE MORRIS Trustee RUSSO, ALBERT (ROBBINSVILLE, NJ)

CLAIM NUMBER	CREDITOR NAME	CLAIM DESCRIPTION	CLAIM AMOUNT	SCHEDULED AMOUNT	INTEREST PAID	PRINCIPAL PAID ▼	PRINCIPAL OWED	MONTHLY PAYMENT
6	PORTFOLIO RECOVERY ASSOCIATES	UNSECURED CREDITORS	\$39,104.31	\$17,269.00	\$0.00	\$14,455.61	\$24,648.70	\$0.00
7	PORTFOLIO RECOVERY ASSOCIATES	UNSECURED CREDITORS	\$29,661.02	\$0.00	\$0.00	\$10,964.73	\$18,696.29	\$0.00
0	ALLEN I. GORSKI, ESQ.	PRIOR ATTORNEY	\$5,292.13	\$5,292.13	\$0.00	\$5,292.13	\$0.00	\$0.00
0	ALLEN I. GORSKI, ESQ.	ATTORNEY FEE	\$4,113.75	\$4,113.75	\$0.00	\$4,113.75	\$0.00	\$0.00
1	BANK OF AMERICA	UNSECURED CREDITORS	\$7,656.07	\$6,858.00	\$0.00	\$2,830.19	\$4,825.88	\$0.00
0	ALLEN I. GORSKI, ESQ.	PRIOR ATTORNEY	\$2,000.00	\$2,000.00	\$0.00	\$2,000.00	\$0.00	\$0.00
4	AMERICAN EXPRESS	UNSECURED CREDITORS	\$2,990.64	\$3,861.00	\$0.00	\$1,105.55	\$1,885.09	\$0.00
3	AMERICAN INFOSOURCE LP AS AGENT FOR	UNSECURED CREDITORS	\$190.86	\$0.00	\$0.00	\$58.60	\$132.26	\$0.00
2	AMERICAN INFOSOURCE LP AS AGENT FOR	UNSECURED CREDITORS	\$107.13	\$0.00	\$0.00	\$32.91	\$74.22	\$0.00
0		DEBTOR REFUND	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
0	PRO SE	PRIOR ATTORNEY	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
5	LIBERTY REVOLVING TRUST BY WILMINGTON	MORTGAGE ARREARAGE S - SECURED	\$0.00	\$296,160.00	\$0.00	\$0.00	\$0.00	\$0.00
8	CITIMORTGAGE INC	MORTGAGE ARREARAGE S - SECURED	\$0.00	\$242,691.00	\$0.00	\$0.00	\$0.00	\$0.00

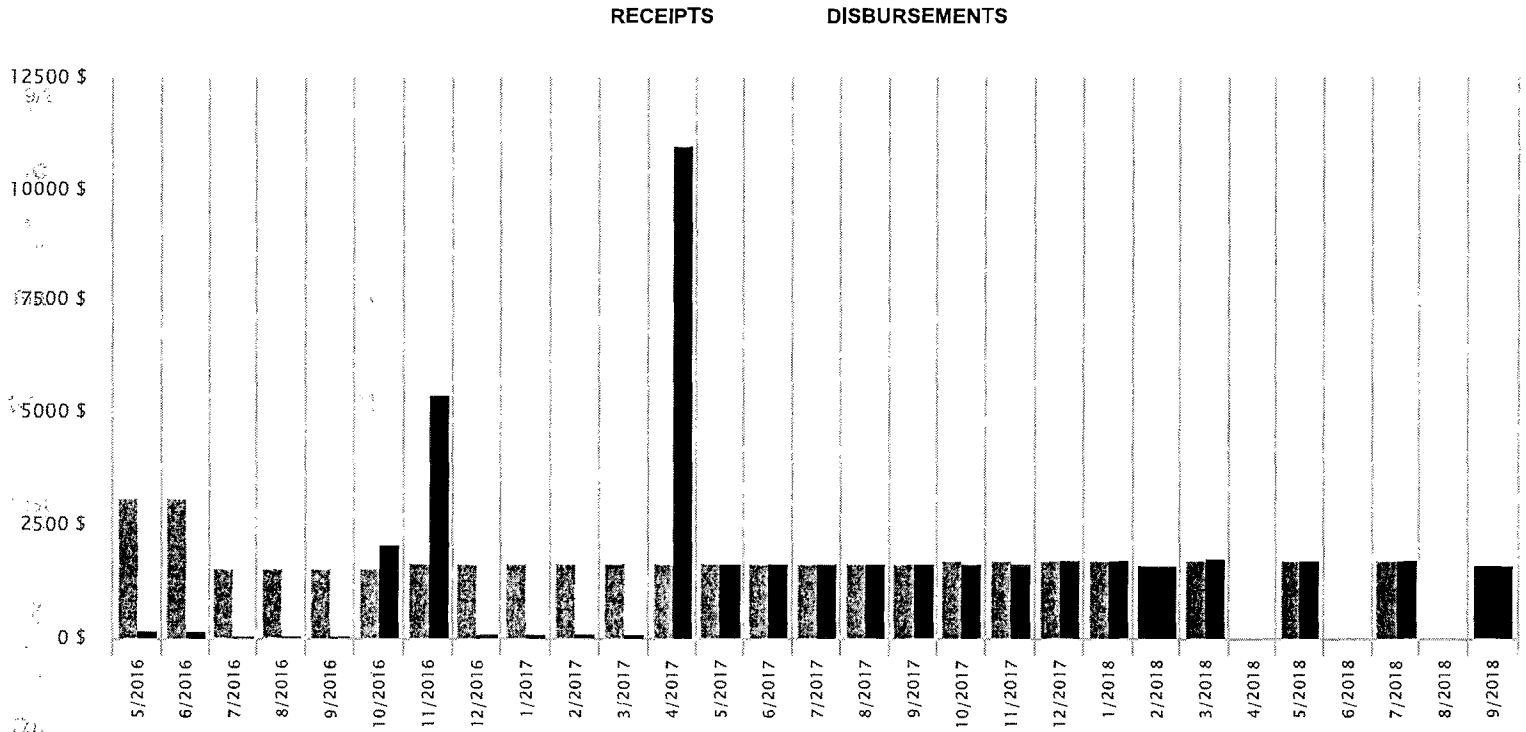
Account Ledger



Case 1613100 Debtor1 BRUCE WAYNE MORRIS Trustee RUSSO, ALBERT (ROBBINSVILLE, NJ)

Filter By All Claims All Payees All Transactions All Time

Receipts & Disbursements



DATE PAID ▼	CLAIM NUMBER	CHECK NUMBER	NAME OF PARTY	DESCRIPTION	AMOUNT
09/05/2018	6	2374541	PORTFOLIO RECOVERY ASSOCIATES	PRINCIPAL (SYSTEM CHECK)	-\$816.47
09/05/2018	7	2374541	PORTFOLIO RECOVERY ASSOCIATES	PRINCIPAL (SYSTEM CHECK)	-\$619.30
09/05/2018	4	2374544	AMERICAN EXPRESS	PRINCIPAL (SYSTEM CHECK)	-\$62.46
09/05/2018	1	2374901	BANK OF AMERICA	PRINCIPAL (SYSTEM CHECK)	-\$159.85
07/25/2018			ALBERT RUSSO	TRUSTEE FEE - PLAN RECEIPT	-\$115.70
07/25/2018			N/A	CASHIER'S CHECK (1509908804)	\$1780.00
07/05/2018	1	2370845	BANK OF AMERICA	PRINCIPAL (SYSTEM CHECK)	-\$159.85
07/05/2018	7	2370506	PORTFOLIO RECOVERY ASSOCIATES	PRINCIPAL (SYSTEM CHECK)	-\$619.30
07/05/2018	4	2370509	AMERICAN EXPRESS	PRINCIPAL (SYSTEM CHECK)	-\$62.44
07/05/2018	6	2370506	PORTFOLIO RECOVERY ASSOCIATES	PRINCIPAL (SYSTEM CHECK)	-\$816.48
05/10/2018			N/A	CASHIER'S CHECK (1509908402)	\$1780.00
05/10/2018			ALBERT RUSSO	TRUSTEE FEE - PLAN RECEIPT	-\$115.70
05/01/2018	6	2366191	PORTFOLIO RECOVERY ASSOCIATES	PRINCIPAL (SYSTEM CHECK)	-\$816.54

DATE PAID ▼	CLAIM NUMBER	CHECK NUMBER	NAME OF PARTY	DESCRIPTION	AMOUNT
05/01/2018	<u>4</u>	2366194	AMERICAN EXPRESS	PRINCIPAL (SYSTEM CHECK)	-\$62.45
05/01/2018	<u>7</u>	2366191	PORTFOLIO RECOVERY ASSOCIATES	PRINCIPAL (SYSTEM CHECK)	-\$619.25
05/01/2018	<u>1</u>	2366478	BANK OF AMERICA	PRINCIPAL (SYSTEM CHECK)	-\$159.87
04/23/2018			ALBERT RUSSO	TRUSTEE FEE - PLAN RECEIPT REVERSAL	\$115.70
04/23/2018			N/A	EPAY NSF (48416050)	-\$1780.00
04/18/2018			N/A	EPAY RECEIPT (48416050)	\$1780.00
04/18/2018			ALBERT RUSSO	TRUSTEE FEE - PLAN RECEIPT	-\$115.70
03/22/2018			ALBERT RUSSO	TRUSTEE FEE - PLAN RECEIPT	-\$115.70
03/22/2018			N/A	EPAY RECEIPT (47664450)	\$1780.00
03/05/2018	<u>1</u>	2361967	BANK OF AMERICA	PRINCIPAL (SYSTEM CHECK)	-\$159.85
03/05/2018	<u>7</u>	2361602	PORTFOLIO RECOVERY ASSOCIATES	PRINCIPAL (SYSTEM CHECK)	-\$619.30
03/05/2018	<u>4</u>	2361605	AMERICAN EXPRESS	PRINCIPAL (SYSTEM CHECK)	-\$62.44
03/05/2018	<u>6</u>	2361602	PORTFOLIO RECOVERY ASSOCIATES	PRINCIPAL (SYSTEM CHECK)	-\$816.48
03/05/2018	<u>2</u>	2362311	AMERICAN INFOSOURCE LP AS AGENT FOR	PRINCIPAL (SYSTEM CHECK)	-\$16.13
03/05/2018	<u>3</u>	2362311	AMERICAN INFOSOURCE LP AS AGENT FOR	PRINCIPAL (SYSTEM CHECK)	-\$17.40
02/01/2018	<u>6</u>	2359985	PORTFOLIO RECOVERY ASSOCIATES	PRINCIPAL (SYSTEM CHECK)	-\$816.48
02/01/2018	<u>7</u>	2359985	PORTFOLIO RECOVERY ASSOCIATES	PRINCIPAL (SYSTEM CHECK)	-\$619.30
02/01/2018	<u>4</u>	2359988	AMERICAN EXPRESS	PRINCIPAL (SYSTEM CHECK)	-\$62.44
02/01/2018	<u>1</u>	2360236	BANK OF AMERICA	PRINCIPAL (SYSTEM CHECK)	-\$159.85
01/17/2018			N/A	EPAY RECEIPT (45999840)	\$1780.00
01/17/2018			ALBERT RUSSO	TRUSTEE FEE - PLAN RECEIPT	-\$115.70
01/05/2018	<u>1</u>	2358063	BANK OF AMERICA	PRINCIPAL (SYSTEM CHECK)	-\$159.85
01/05/2018	<u>4</u>	2357702	AMERICAN EXPRESS	PRINCIPAL (SYSTEM CHECK)	-\$62.44
01/05/2018	<u>7</u>	2357699	PORTFOLIO RECOVERY ASSOCIATES	PRINCIPAL (SYSTEM CHECK)	-\$619.30
01/05/2018	<u>6</u>	2357699	PORTFOLIO RECOVERY ASSOCIATES	PRINCIPAL (SYSTEM CHECK)	-\$816.48
12/22/2017			ALBERT RUSSO	TRUSTEE FEE - PLAN RECEIPT	-\$115.70
12/22/2017			N/A	EPAY RECEIPT (45366150)	\$1780.00
12/05/2017	<u>6</u>	2355372	PORTFOLIO RECOVERY ASSOCIATES	PRINCIPAL (SYSTEM CHECK)	-\$343.11
12/05/2017	<u>7</u>	2355372	PORTFOLIO RECOVERY ASSOCIATES	PRINCIPAL (SYSTEM CHECK)	-\$260.40
12/05/2017	<u>0</u>	8000108	ALLEN I. GORSKI, ESQ.	ATTORNEY FEE (SYSTEM CHECK)	-\$964.76
12/05/2017	<u>4</u>	2355375	AMERICAN EXPRESS	PRINCIPAL (SYSTEM CHECK)	-\$26.24
12/05/2017	<u>1</u>	2355729	BANK OF AMERICA	PRINCIPAL (SYSTEM CHECK)	-\$67.18